



ecology and environment, inc.

160 SPEAR STREET, SAN FRANCISCO, CALIFORNIA 94105, TEL. 415/777-2811

International Specialists in the Environment

SFUND RECORDS CTR
2070777

MEMORANDUM

TO: Lisa Nelson, EPA Region IX

FROM: Karen Ladd, Ecology and Environment, Inc. *KJ*

DATE: September 5, 1991

SUBJECT: Completed Work

cc: Marcia Brooks, E & E FIT

Attached is the following completed:

PA___ PA Review x SSI___ LSI___ SIRE___

Other_____

Site Name: Syntex Ophthalmics, Inc.

EPA ID #: AZD982007767 (848)

City, County: Phoenix, Arizona

State Recommendation: No Further Remedial Action Planned under CERCLA
(for Reviews only)

FOR EPA USE ONLY

CERCLIS Lead:

PA complete
State lead

recommend: NFRAP

Lon Ladd
9-18-91

slu/soi/cwm

recycled paper



ecology and environment, inc.

160 SPEAR STREET, SAN FRANCISCO, CALIFORNIA 94105, TEL. 415/777-2811

International Specialists in the Environment

PRELIMINARY ASSESSMENT REVIEW

SUBMITTED TO: Lisa Nelson, EPA Region IX Site Assessment Manager
PREPARED BY: Scott Ludeke, Ecology and Environment, Inc. *SL*
DATE: August 7, 1991
SITE: Syntex Ophthalmics, Inc., prepared by Shelley J. Miller of Arizona Department of Environmental Quality, dated July 15, 1991.
TDD#: F9-9103-020
EPA ID#: AZD982007767
FIT REVIEW/CONCURRENCE: *Janet C Kaps 9/5/91*

cc: FIT Master File

INTRODUCTION

This Preliminary Assessment has been reviewed by Ecology and Environment, Inc.'s Field Investigation Team (E & E FIT) according to U.S. Environmental Protection Agency (EPA) guidelines presented in the "Preliminary Assessment Interim Guidance Document for Fiscal Year 1988." FIT has evaluated this site with respect to the Hazard Ranking System (HRS) (Federal Register, Vol. 55, No. 421, 51532-51667, December 14, 1990).

RCRA STATUS

☐ Generator ☐ Small Quantity Generator ☐ Transporter
☐ TSD ☒ Not Listed in RCRA Database

HRS CONSIDERATIONS

- o Syntex Ophthalmics, Inc. vacated the premises in 1984 and no longer generates or stores CERCLA hazardous wastes at the site;
- o There is no known history of releases or of improper handling of wastes at the site;

- o Groundwater from wells within 4 miles of the site serves a moderate population of approximately 42,000 people;
- o The potential for hazardous substances to migrate from the site to groundwater is relatively low due to negative net precipitation and 185 feet of intervening material of moderate to low hydraulic conductivity; and
- o Surface water within 15 miles is apparently not used for human beneficial purposes.

COMMENTS

Information contained in the report is sufficient to determine eligibility for the National Priorities List.

The hazardous waste quantity factor assigned to the site was based on incomplete information and therefore cannot be assigned a value of 1. The HRS (Section 2.4.2.2) states that if the waste quantity on site is not adequately determined and none of the targets are subject to Level I or Level II contamination, a default value of 10 should be assigned.

The report states that between ground surface and groundwater is 185 feet of "sands and clays." The reference for this information is a well driller's report. Without specific knowledge of the thickness, hydraulic conductivity, and lateral continuity of individual layers, we cannot assume that hydrogeologic conditions warrant a travel time factor value of 5. A more environmentally conservative assumption would be that the intervening material is not as thick and/or that the hydraulic conductivity of the material is higher, which increases the travel time factor value to 15.

The report discusses surface water pathway targets within 4 miles of the site; the HRS (Section 4.1.1.2) states that the correct target distance limit is 15 miles. Regional climatic conditions and water use practices strongly imply that surface water is not used for drinking even within 15 miles of the site. Information about sensitive species within 15 miles downstream of the site was not provided in the report.

Even with the above changes and considerations, the overall site score indicates that the site appears ineligible for the National Priorities List.

CONCLUSIONS

- ☐ Potentially eligible for National Priorities List
- ☒ Appears to be ineligible for National Priorities List

STATE RECOMMENDATION

 x No Further Remedial Action Planned under CERCLA
 Medium-priority Screening Site Inspection (mSSI)
 High-priority Screening Site Inspection (hSSI)

EPA RECOMMENDATION

	<u>Initial</u>	<u>Date</u>
No Further Remedial Action Planned under CERCLA	<u> fw </u>	<u> 9-18-91 </u>
Higher-Priority SSI under CERCLA	<u> </u>	<u> </u>
Lower-Priority SSI under CERCLA	<u> </u>	<u> </u>
Defer to Other Authority (e.g., RCRA, TSCA, NRC)	<u> </u>	<u> </u>

Notes: